

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

HERU SPENCER,

Plaintiff,

v.

THE CHURCH OF PRISMATIC LIGHT,

TIFFANY WAIT,

KATRINA ROSE WOLFF,

JERI CLARK, and

IDA HAMILTON,

Defendants

Case No.: 22-CV-257

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**DEFENDANT THE CHURCH OF PRISMATIC LIGHT AND TIFFANY WAIT’S  
ANSWER TO PLAINTIFF’S ORIGINAL COMPLAINT**

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Defendants, the Church of Prismatic Light (“CPL”) and Tiffany Wait (“Wait”) (together, “Defendants”)<sup>1</sup>, by their attorneys, state as follows for their answer to Plaintiff’s Complaint:

**A. PARTIES**

1. Plaintiff, Heru Spencer, is a citizen of Wisconsin and resides at 501 N Henry St #610, Madison, WI 53703.

**ANSWER NO. 1:** Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

2. Defendant, CPL is a Nonprofit Charitable Organization that is incorporated in Oklahoma with a registered agent at 3030 Northwest Expressway, Suite 200, #126, Oklahoma City, OK 73112.

**ANSWER NO. 2:** CPL admits that CPL is a Nonprofit Charitable Organization that is incorporated in Oklahoma with a registered agent at this address.

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<sup>1</sup> Defendants Katrina Rose Wolff, Jeri Clark, and Ida Hamilton were not served with the Original Complaint nor any other pleadings. (See EFC No. 15.). Tiffany Wait signed for all listed Defendants, however, these Defendants did not authorize such acceptance, nor did the United States Marshals Service serve their residences.

3. Defendant, Tiffany Wait, is a resident of Oklahoma and resides at 3030 Northwest Expressway, Suite 200, #126, Oklahoma City, OK 73112.

**ANSWER NO. 3:** Wait admits only that she is a resident of Oklahoma. Except as so admitted, Wait denies all remaining allegations.

4. Defendant, Katrina Rose Wolff, Jeri Clark and Ida Hamilton reside in state of Oklahoma.

**ANSWER NO. 4:** Upon information and belief, Defendants admit only that Jeri Clark and Ida Hamilton are residents of Oklahoma. Except as so admitted, Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph.

**B. STATEMENT OF CLAIM.** Tiffany Wait, Ida Hamilton, Jeri Clark, Katrina Rose Wolff, used my intellectual property the mark “The Church of Prismatic Light” to start their company in Oklahoma on 4/18/2022. Tiffany started to post the name as her own to social media TikTok, saying she started a church call “The Church of Prismatic Light.” I started a church and created that name 5/2/2020 and have been using that and two other names for my church since 5/2/2020. I filed a trademark for the name and am currently waiting for it to be approved. Tiffany Wait and all listed are in violation of intellectual trademark and copyright infringement. I am seeking an injunction as they are using my intellectual property on their website and social media as well as creating merchandise. I am also seeking damages.

**ANSWER:** Defendants admit only that it has used the name “The Church of Prismatic Light.”

Wait admits to utilizing TikTok to spread awareness of the newly formed nonprofit charitable organization named CPL. Upon information and belief, Defendants admit that Plaintiff has been using two other names for his church, and that Plaintiff filed an application for a trademark of the phrase “The Church of Prismatic Light” on May 3, 2022, which has not been approved yet, Defendants lack knowledge or information sufficient to form a belief about the truth as to how long Plaintiff has been using the other names for his church. Except as so admitted and alleged, Defendants deny all remaining allegations,

including Plaintiff's allegations that Defendants used Plaintiff's intellectual property and violated or interfered with intellectual trademark and copyright infringement laws.

**C. JURISDICTION.** I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$7,500,000.

**ANSWER:** Defendants deny that the amount of money at stake in this case including interest and costs is \$7,500,000. Except as so denied, Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph.

**D. RELIEF WANTED.** I am seeking damages as per the trademark violation fine penalty which is \$150,000. There are over 300 violations, however, I am only asking for a fraction of that. Also, I am requesting they cease forever use of my intellectual property and ideas, which they stole. I am requesting she write a public letter and statement of apology and clarification of who started the church and who's property the name belongs to, also stating credit of said idea to me, publicly.

**ANSWER:** Defendants admit that Plaintiff demands relief. Defendants deny that it violated trademark law or any other law and deny that Plaintiff is entitled to any relief against Defendants. Defendants lack knowledge or information sufficient to form a belief about the truth of any remaining allegations in this paragraph.

**E. JURY DEMAND.** I want a jury to hear my case.

**ANSWER:** Defendants admit that Plaintiff states that he wants a jury to hear this case. Defendants lack knowledge or information sufficient to form a belief about the truth of any remaining allegations in this paragraph.

Defendants deny all other allegations set forth in Plaintiff's Complaint not expressly admitted.

Dated: August 18, 2022

Respectfully submitted,

HUSCH BLACKWELL LLP  
Attorneys for Defendants

By: Electronically signed by  
Natalia S. Kruse

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